

Draft Smart Grid Investment Grant Program Recovery Act Reporting Guidance
Cleco Power LLC
(Control No. **09-0263**)
February 12, 2010

1. In regard to Clause 4, is the Recipient required to submit the “Jobs Created and Retained Data” quarterly?

DOE Response: The recipient is required to report both on a quarterly and monthly basis depending on the type of data. Clauses 4.1 and 4.2 require Jobs Created and Retained as calculated by FTE (Total project hours worked divided by hours in a full-time schedule) to be reported **quarterly**. However, the requirement to report total head count – Clause 4.3 – would be required monthly.

2. In regard to Clause 2.1, it is stated that the PVMS Data elements identified in Section 2 shall be reported by the prime recipient to DOE on a monthly basis.

It was previously stated (see Section 5A Attachment B – Award Agreement) that “The Recipient must report the data specified in this section on a monthly basis beginning with the first month following notification of approval by the Office of Management and Budget of the Department of Energy’s request for monthly reporting. The data in this section is required quarterly until that time.”

Has the Office of Management and Budget approved the Department of Energy’s request for monthly reporting for the “Progress Report” and the “Cumulative Jobs Created and Retained” reporting?

DOE Response: The Department’s request is currently under consideration by OMB as of 02-17-2010. DOE will communicate to SGIG recipients the results of OMB’s review of the request once it is available. As part of OMB’s review, comments such as these are being requested from the public for consideration.

3. In regard to reporting frequency in general, Cleco prefers that any monthly reporting be changed to quarterly due to the level of resources required to provide the data on a monthly basis. Specifically, such a change in regard to the Progress Report would be in accordance with 10 C.F.R. § 600.341(a)(1) and Attachment B - Reporting Requirements Checklist FINAL.

DOE Response: DOE’s request for monthly reporting must be approved by OMB precisely because of the restrictions of 10 C.F.R. § 600.34(a)(1). 10 CFR 600.34 limits the frequency of this reporting to quarterly. Only if OMB approves DOE’s request would the Department have the authority to require reporting on a monthly basis.

DOE has made this request for approval for monthly reporting to OMB for the following reasons. First, the visibility and importance of the Smart Grid to the public at-large necessitates a greater level of scrutiny, transparency, and accountability than is common for federal financial assistance projects. In addition, the Recovery Act calls for greater transparency and accountability in the

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use of Recovery Act funds. Thus, DOE believes that monthly reporting of key project management, jobs, and risk data will fulfill those provisions of the Recovery Act.

Second, the relatively short duration of these projects – 36 months or less – afford little opportunity to correct cost or schedule variances should they be reported quarterly. It is conceivable that, under quarterly reporting, a project could be irretrievably off track by the time DOE and the recipient can implement corrective action based on data that may be as much as five months old. Monthly reporting will allow variances to be identified more quickly and corrective action to have greater effect, thereby improving the project's chances of success.

4. In regard to the Technical Project Management System, when would it become available for the recipient?

DOE Response: The TPMS is currently in development and is expected to be available for use by recipients in late March 2010.